

# EXHIBIT 33

Hon. Tiffany M. Cartwright

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JOANN LEDOUX,

Plaintiff,

v.

OUTLIERS, INC., DANIEL FREED, MATT  
RUBIN, BRAND NUTRACEUTICALS, INC.,  
BRAND PACKAGING GROUP, INC., and  
JOHN AND JANE DOES 1–5,

Defendants.

CASE NO. 3:24-cv-5808-TMC

**SAMEER ANAND’S OBJECTIONS TO  
SUBPOENA TO TESTIFY AT A  
DEPOSITION IN A CIVIL ACTION**

TO: Plaintiff Joann LeDoux, by and through her counsel Jocelyn C. Stewart, LAW  
OFFICE OF JOCELYN C. STEWART, CORP., 1201 Pacific Avenue, Suite 600, Tacoma,  
Washington 98407.

Nonparty Sameer Anand submits the following objections and responses to Plaintiff Joann  
LeDoux’s April 18, 2025 Subpoena to Testify at a Deposition in a Civil Action.

Respectfully submitted,

MURPHY BALL STRATTON LLP

/s/ Rick Houghton

Rick Houghton (TX Bar No. 24121678)  
(admitted *Pro Hac Vice*)

Michelle Stratton (TX Bar No. 24085606)  
(admitted *Pro Hac Vice*)

[Signatures continued on next page.]

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(admitted *Pro Hac Vice*)  
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*Attorneys for Sameer Anand*

**OBJECTIONS AND RESPONSES TO DEPOSITION COMMAND**

Anand objects to Plaintiff's command that she appear for deposition because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand further objects to deposition by Zoom.

**OBJECTIONS AND RESPONSES TO DOCUMENT REQUESTS**

1. Copies of all employment records and human resource records, including but not limited to personnel records, training records, notes, reports, memoranda, studies, examination and test results, performance evaluations, attendance records, employment contracts, payroll records, per diem payment records, performance or other bonus records, check stubs, W-2 forms, W-9 forms, 1099 forms, any documents relating to fringe benefits, healthcare stipends, short and long term disability insurance, disability accommodations, FMLA, sick and other leave records, payroll records, pay stubs, photographs, awards and accommodations, and correspondence. Dates for these records should be consistent with the affidavit begin in advance of July 2021 employment and extend to the present.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request lacks a reasonable substantive or temporal limitation, and because the request seeks information for employers other than Outliers, Inc., Anand objects to the request as overbroad, unduly burdensome, and not proportional to the needs of the case. Anand further objects to this request as seeking protected health information and because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

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- 2
- 3 2. Unredacted Record(s) that includes Full Social Security number for issuance of subpoenas to
- 4 Internal Revenue Service, for verification of pay, bonuses, W-2 forms, W-9 forms, 1099 forms,
- 5 healthcare stipends, et al.

6 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the

7 subpoena or tender the required fees. Anand objects to this request because it demands production

8 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly

9 transacts business in person. Anand objects to this request because it is irrelevant to the claim or

10 defense of any party to the underlying civil action and, thus, seeks information that is not

11 reasonably calculated to lead to the discovery of admissible evidence. For the same reason, and

12 because the request seeks an undefined and unlimited (by time or scope) category of records,

13 Anand objects to this request as overbroad and not proportional to the needs of the case. Anand

14 objects to this request as vague, ambiguous, confusing, and unduly burdensome because it does

15 not specify the type of “Unredacted Record(s)” sought and, through the inclusion of “et al.,”

16 appears to include a limitless scope of material.

- 17 3. All documents reflecting any grant, offer, or receipt of equity, stock options, profit interest units,
- 18 or other ownership interests in Outliers, Inc. (d/b/a Thesis), or its predecessor organizations,
- 19 including but not limited to: offer letters, equity agreements or vesting schedules, communications
- 20 referencing ownership or incentive-based compensation, and any documents reflecting your
- 21 percentage ownership or value of your interest.

22 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the

23 subpoena or tender the required fees. Anand objects to this request because it demands production

24 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly

25 transacts business in person. Anand objects to this request because it is irrelevant to the claim or

26 defense of any party to the underlying civil action and, thus, seeks information that is not

reasonably calculated to lead to the discovery of admissible evidence. For the same reason, because

the request fails to include a reasonable topical or temporal limitation, and because the request

seeks “All documents reflecting any grant, offer, or receipt of equity, stock options, profit interest

units, or other ownership interests in Outliers, Inc. (d/b/a Thesis), or its predecessor organizations,” as overbroad, unduly burdensome, and not proportional to the case’s needs. Anand further objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

4. All documents reflecting any grant, offer, issuance, or award of equity, stock options, profit interest units, or other ownership interests in Outliers, Inc. (d/b/a Thesis), whether as part of your original employment, subsequent reclassification as an independent contractor, or at any other time during your affiliation with the company.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks “All documents reflecting any grant, offer, issuance, or award of equity, stock options, profit interest units, or other ownership interests in Outliers, Inc.,” and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case.

5. All documents and communications reflecting the terms, structure, or value of any equity or ownership interests you were offered or granted, including but not limited to offer letters, employment agreements, contractor agreements, equity agreements, vesting schedules, or amendments to any of the foregoing.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the

request seeks “All documents and communications reflecting the terms, structure, or value of any equity or ownership interests you were offered or granted,” because the request seeks information concerning unspecified entities or employers, because the request lacks a reasonable topical limitation, and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

6. All communications regarding your eligibility for, entitlement to, or receipt of equity, ownership, or incentive compensation from Outliers, Inc. (d/b/a Thesis), or any of its predecessor companies, e.g. Formula, including any negotiations or renegotiations of such terms at the time of hire, during employment, upon transition to contractor status, or at any other time.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks “All communications regarding your eligibility for, entitlement to, or receipt of equity, ownership, or incentive compensation from Outliers, Inc. (d/b/a Thesis), or any of its predecessor companies, e.g. Formula,” and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand objects to this request based on the attorney-client privilege.

7. All documents reflecting any financial or reputational incentives provided or promised to you for submitting any affidavit or declaration in connection with a legal proceeding involving Outliers, Thesis, Formula, or Dan Freed.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly

transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks information about unrelated legal proceedings, and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

8. Any drafts, versions, or communications relating to any declarations, affidavits, or statements you provided in connection with any litigation or arbitration involving Outliers, Thesis, Formula, or Dan Freed, including communications regarding the contents of such declarations.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks information about unrelated legal proceedings (“any litigation or arbitration”), and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects to the request based on the attorney-client privilege and attorney work-product doctrine.

9. Any drafts, versions, or communications provided to you to assist you in formulating any declarations, affidavits, or statements you provided in connection with any litigation or arbitration involving Outliers, Thesis, Formula, or Dan Freed, including communications regarding the contents of such declarations.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly



transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks information about unrelated legal proceedings (“any litigation or arbitration”), and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects to the request based on the attorney-client privilege and attorney work-product doctrine.

10. Any communications, notes, outlines, or directions provided to you in formulating any arbitration involving Outliers, Thesis, Formula, or Dan Freed, including communications regarding the contents of such declarations.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand objects to the request based on the attorney-client privilege and attorney work-product doctrine. Anand objects to this request as vague, ambiguous, and confusing as to the phrase “in formulating any arbitration.” Anand further objects to this request based on the attorney-client privilege and because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

11. All documents reflecting access granted to you or your representatives to Carta (or other equivalent equity tracking software), and any communications or reports you obtained or received from those systems between January 2020 to present.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, and because the temporal scope of the request is unreasonable, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand objects to the phrases “accesses granted to you” and “or your representatives” as vague, ambiguous, and confusing. Anand further objects that this request is duplicative of Requests Nos. 12, 13, and 23. Anand lastly objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

12. Any communications with Dan Freed or Outliers, Thesis, or Formula representatives regarding your inclusion in the capitalization (“cap”) table or any changes thereto between January 2020, to present.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, and because the temporal scope of the request is unreasonable, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects that this request is duplicative of requests Nos. 11, 13, and 23 and because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

13. Any documents provided to you showing or summarizing the cap table of Outliers, Inc. (d/b/a Thesis), including screenshots or reports from Carta or any other equity management platform.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand also objects that this request is duplicative of Requests Nos. 11, 12, and 23 and because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

14. All communications between you and Dan Freed, or any officer, director, or employee of Outliers, Thesis, and/or Formula, regarding compensation, equity, or any other incentive for your continued loyalty, participation, or silence in relation to any litigation, arbitration, or internal investigation.

**RESPONSE:** Anand objects to this request under the attorney-client privilege. Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks information regarding unrelated “litigation, arbitration[s], or internal investigation[s],” and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the

needs of the case. Anand further objects to this request based on the attorney-client privilege and because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

15. All communications between you and Dan Freed, or any officer, director, or employee of Outliers, Thesis, and/or Formula, regarding your role as “advisor” to Thesis.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks “All communications between you and Dan Freed, or any officer, director, or employee of Outliers, Thesis, and/or Formula, regarding your role as ‘advisor’ to Thesis,” and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects to this request based on the attorney-client privilege and because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

16. All documents reflecting any additional or renegotiated grant, offer, or receipt of equity, stock options, profit interest units, other ownership interests in Outliers, Inc. (d/b/a Thesis), or its predecessor organizations, or any other value conveyed, promised, or implied, in exchange for your role as “advisor” to Thesis.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the

request seeks “All documents” regarding the identified subject matter, and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

17. All documents reflecting any appointment, nomination, or service by you as a member of the board of directors, advisory board, or any governance body of Outliers, Inc. (d/b/a Thesis), whether formal or informal.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks “All documents” concerning the identified subject matter, and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand objects to this request as vague, ambiguous, and confusing as to the phrases “reflecting any appointment, nomination, or service by you,” “any governance body,” and “formal or informal.” Anand further objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

18. All communications concerning your potential or actual role as a board member or advisor to Outliers, Inc. (d/b/a Thesis), including communications with Dan Freed or any officer, employee, investor, or representative of the company.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or

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2 defense of any party to the underlying civil action and, thus, seeks information that is not  
3 reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the  
4 request seeks “All communications concerning your potential or actual role as a board member or  
5 advisor to Outliers, Inc. (d/b/a Thesis),” and because the request lacks any temporal limitation,  
6 Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand  
7 objects to this request based on the attorney-client privilege. Anand objects to this request as vague,  
8 ambiguous, and confusing as to the phrase “potential or actual role.” Anand further objects because  
9 Plaintiff has not shown that a party to the lawsuit does not have the requested materials.  
10

- 11 19. All documents reflecting responsibilities, duties, or expectations communicated to you in  
12 connection with any board, advisory, or governance role at Outliers, Inc. (d/b/a Thesis), whether  
13 in writing or through electronic communications.

14 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the  
15 subpoena or tender the required fees. Anand objects to this request because it demands production  
16 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly  
17 transacts business in person. Anand objects to this request because it is irrelevant to the claim or  
18 defense of any party to the underlying civil action and, thus, seeks information that is not  
19 reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the  
20 request seeks “All documents reflecting responsibilities, duties, or expectations communicated to  
21 you in connection with any board, advisory, or governance role at Outliers, Inc.,” and because the  
22 request lacks any temporal limitation, Anand also objects to the request as overbroad and not  
23 proportional to the needs of the case. Anand objects to this request based on the attorney-client  
24 privilege. Anand objects to this request as vague, ambiguous, and confusing as to the phrase “any  
25 . . . governance role.” Anand further objects because Plaintiff has not shown that a party to the  
26 lawsuit does not have the requested materials.

20. All agendas, minutes, resolutions, or materials you received in connection with any board or  
governance meetings, whether or not you formally served as a director at the time.

**RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the subpoena or tender the required fees. Anand objects to this request because it demands production of documents at a place not within 100 miles of where Anand resides, is employed, or regularly transacts business in person. Anand objects to this request because it is irrelevant to the claim or defense of any party to the underlying civil action and, thus, seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the request seeks information unrelated to Outliers, Inc., because the request seeks “All agendas, minutes, resolutions, or materials you received in connection with any board or governance meetings,” and because the request lacks any temporal limitation, Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand further objects because Plaintiff has not shown that a party to the lawsuit does not have the requested materials.

21. Please produce the following documents and communications concerning changes in leadership or personnel at Outliers, Inc. (d/b/a Thesis):

- a. All documents and communications you received, created, or contributed to regarding the cessation of employment, departure, or role change of any executive, officer, or key employee of Outliers, Inc. (d/b/a Thesis), including but not limited to Katy Marshall (former Chief Operating Officer), Gabriel Marcial (former Chief Marketing Officer), and Dan Freed (now listed as Co-Founder rather than CEO and Co-Founder).
- b. All documents and communications reflecting the reasons, circumstances, or company explanation for the change in Dan Freed’s title from “CEO and Co-Founder” to “Co-Founder,” including any internal or external communications relating to his current role, status, or ongoing involvement in Outliers, Inc. (d/b/a Thesis).
- c. All communications sent to or from you in your capacity as an equity holder, advisor, or participant in any shareholder or governance communications regarding the departure or role change of Katy Marshall, Gabriel Marcial, or Dan Freed, including any company efforts to inform or reassure investors, stakeholders, or advisors about the significance or impact of such departures.
- d. All drafts or final versions of internal or external communications (including investor updates, Slack messages, emails, newsletters, or memos) that you received, reviewed, contributed to, or were otherwise aware of concerning leadership transitions involving Katy Marshall, Gabriel Marcial, or Dan Freed.

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2 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the  
3 subpoena or tender the required fees. Anand objects to this request because it demands production  
4 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly  
5 transacts business in person. Anand objects to this request because it is irrelevant to the claim or  
6 defense of any party to the underlying civil action and, thus, seeks information that is not  
7 reasonably calculated to lead to the discovery of admissible evidence. For that reason, and because  
8 the temporal and substantive scope of the request is unreasonable, Anand also objects to the request  
9 as overbroad and not proportional to the needs of the case. Anand objects to this request as vague,  
10 ambiguous, and confusing as to the phrases/terms “changes in leadership,” “changes  
11 in . . . personnel,” “role change,” “key employee,” “reasons, circumstances, or company  
12 explanation,” “efforts to inform or reassure . . . about the significance of impact of such  
13 departures,” and “leadership transitions.” Anand further objects because Plaintiff has not shown  
14 that a party to the lawsuit does not have the requested materials.  
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- 17 22. All documents and communications you received, reviewed, or were copied on relating to any  
18 capital raise, investment, or financing event involving Outliers, Inc. (d/b/a Thesis), including but  
19 not limited to investments from angel investors, venture capital firms, private equity, or strategic  
20 investors.

21 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the  
22 subpoena or tender the required fees. Anand objects to this request because it demands production  
23 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly  
24 transacts business in person. Anand objects to this request because it is irrelevant to the claim or  
25 defense of any party to the underlying civil action and, thus, seeks information that is not  
26 reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the  
request seeks information unrelated to Outliers, Inc., because the request lacks a temporal  
limitation, and because the request seeks “All documents and communications” concerning the  
identified subject matter, Anand also objects to the request as overbroad and not proportional to



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2 the needs of the case. Anand objects to this request as vague, ambiguous, and confusing as to the  
3 phrases “involving Outliers, Inc.” “relating to any capital raise, investment, or financing event,”  
4 and “angel investors, venture capital firms, private equity, or strategic investors.” Anand further  
5 objects to the request based on attorney-client privilege. Anand lastly objects that this request is  
6 duplicative of Requests Nos. 24 and 25 and because Plaintiff has not shown that a party to the  
7 lawsuit does not have the requested materials.  
8

9 23. All documents reflecting updates to the capitalization table (cap table) of Outliers, Inc. (d/b/a  
10 Thesis), including but not limited to reports generated from Carta or any other equity management  
11 system, that you received, accessed, or reviewed.

12 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the  
13 subpoena or tender the required fees. Anand objects to this request because it demands production  
14 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly  
15 transacts business in person. Anand objects to this request because it is irrelevant to the claim or  
16 defense of any party to the underlying civil action and, thus, seeks information that is not  
17 reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the  
18 request lacks a temporal limitation, and because the request seeks information unrelated to Outliers,  
19 Inc., and because the request seeks “All documents” concerning the identified subject matter,  
20 Anand also objects to the request as overbroad and not proportional to the needs of the case. Anand  
21 lastly objects that this request is duplicative of Requests Nos. 11, 12, and 13 and because Plaintiff  
22 has not shown that a party to the lawsuit does not have the requested materials.

23 24. All communications sent to you, or to any group of shareholders or advisors of which you were a  
24 part, notifying you of new investments, funding rounds, changes in company valuation, or issuance  
25 of new shares, equity interests, or securities.

26 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the  
subpoena or tender the required fees. Anand objects to this request because it demands production  
of documents at a place not within 100 miles of where Anand resides, is employed, or regularly

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2 transacts business in person. Anand objects to this request because it is irrelevant to the claim or  
3 defense of any party to the underlying civil action and, thus, seeks information that is not  
4 reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the  
5 request seeks information unrelated to Outliers, Inc., because the request lacks a temporal  
6 limitation, and because the request seeks "All communications" concerning the identified subject  
7 matter, Anand also objects to the request as overbroad and not proportional to the needs of the  
8 case. Anand objects to this request as vague, ambiguous, and confusing as to the phrases "new  
9 investments," "funding rounds," "company valuation," and "issuance of new shares, equity  
10 interests, or securities." Anand further objects to this request based on the attorney-client privilege.  
11 Anand lastly objects that this request is duplicative of Requests No. 22 and 25 and because Plaintiff  
12 has not shown that a party to the lawsuit does not have the requested materials.  
13

14 25. All documents or communications authored, reviewed, or contributed to by you in connection with  
15 investor updates, shareholder communications, or internal summaries related to fundraising events,  
16 investment milestones, or company valuation changes.

17 **RESPONSE:** Anand objects to this request because Plaintiff did not effect proper service of the  
18 subpoena or tender the required fees. Anand objects to this request because it demands production  
19 of documents at a place not within 100 miles of where Anand resides, is employed, or regularly  
20 transacts business in person. Anand objects to this request because it is irrelevant to the claim or  
21 defense of any party to the underlying civil action and, thus, seeks information that is not  
22 reasonably calculated to lead to the discovery of admissible evidence. For that reason, because the  
23 request seeks information unrelated to Outliers, Inc., because the request lacks a temporal  
24 limitation, and because the request seeks "All documents or communications" concerning the  
25 identified subject matter, Anand also objects to the request as overbroad and not proportional to  
26 the needs of the case. Anand objects to this request as vague, ambiguous, and confusing as to the  
phrase "in connection with investor updates, shareholder communications, or internal summaries

1  
2 related to fundraising events, investment milestones, or company valuation changes.” Anand  
3 further objects to this request based on the attorney-client privilege. Anand lastly objects that this  
4 request is duplicative of Requests Nos. 22 and 24 and because Plaintiff has not shown that a party  
5 to the lawsuit does not have the requested materials.  
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